



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

March 25, 2010

Certified Mail

7004 2510 0001 8625 5349

CCI Manufacturing IL Corp
Attn: Dan Aloia
15550 Canal Bank Road
Lemont, Illinois 60439

Re: 0311625058 – Cook County
CCI Manufacturing IL Corp
Log No. BUD10-005
Expiration Date: March 3, 2015
Permit File
Permit Approval

Dear Mr. Aloia:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed your application for a beneficial use determination (BUD) identified in the Illinois EPA records as Log BUD10-005 and received on February 16, 2010. Your BUD request for the use of product (antifreeze) line flushing's (flushing's) to make antifreeze is approved in accordance with Section 22.54 of the Illinois Environmental Protection Act and the material is not a waste when used in accordance with the following conditions:

1. Approval is only for the use of ethylene glycol based materials as a raw ingredient in manufacturing an aftermarket product as specifically identified and described in your application Log No. BUD10-005. Approval does not apply to circumstances where the source of material, method of generation, characteristics of the material, location or methods of use of the material vary from the information in the conditions of this letter or you approved application. If the information changes from that described in the application; Log BUD10-005, the beneficial reuse activity shall cease until it has received a new beneficial use determination from the Illinois EPA or a written determination that a new BUD is not required. If changes occur which modify any of the information used in obtaining this authorization, the applicant of record shall notify the Illinois EPA. Such changes would include but not be limited to any changes in the names or addresses of both beneficial and legal titleholders to the site where the material is used.
2. The flushing's shall only be used in a manner that is protective of human health, safety and the environment and in compliance with applicable state and federal law. It should be noted that the issuance of this authorization does not relieve the CCI Manufacturing IL

Corp. responsibility of complying with the provisions of the State of Illinois Rules and Regulations, 35 IAC, Subtitle B, Air Pollution Control, Chapter 1.

3. The flushing's shall be collected and stored in a manner which prevents cross contamination from non-ethylene glycol based product flushing's or other waste streams.
4. This BUD only authorizes the use of the flushing's by Recycling Fluid Technologies Inc. in making the ethylene glycol based aftermarket products (antifreeze) specified in the BUD application (e.g., DEX-COOL Coolant). Additional users of the flushing's in aftermarket products may be authorized under this BUD only if they manufacture similar products for the same uses specified in application log no. BUD10-005 and documentation of this material user including name, address, phone number, contact person, specified use, product specification and documentation of compliance with the terms of this BUD are kept with CCI's operating record and made available to the Agency upon request.
5. The amount of flushing's shipped offsite and destination shall be compiled monthly and maintained in bound or electronically imaged chronological files.
6. This authorization shall terminate under operation of law if, due to a change in law, it conflicts with the law; however, the recipient of the determination may apply for a new beneficial use determination that is consistent with the law as amended.
7. This authorization does not apply to hazardous waste, coal combustion waste, coal combustion by-product, sludge applied to the land, potentially infectious medical waste, or used oil.
8. This authorization does not apply to material that is burned for energy recovery, that is used to produce a fuel, or that is otherwise contained in a fuel.
9. This authorization is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities, except as authorized by a permit from the Bureau of Water (BOW).
10. This authorization is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.
11. Any application for renewal of this BUD shall include the beneficial use application form LPC-PA27 and be filed with the Illinois EPA at least 180 days prior to the expiration date of this permit.

12. The operator shall retain copies of all operating records including any affidavits, records of retention times, training records, daily reports, inspection reports, incident reports, ~~material profile identification sheets, re-certifications, certifications of representative~~ samples, laboratory analyses, special analysis plans, and any waivers of requirements, at the office of the facility for five years after this authorization expires. These records shall be made available to the Illinois EPA upon request.

This determination is subject to review under Section 40 of the Act. Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:MAS:bjh\102962s.doc

cc: Paul G. Nelson, P.E., CHMM



Advanced Searches



Select the options with which to search:

All searches are based on an **and** condition. [Hint](#)

Basic		Wildcard		Owner / Operator	
Handler ID: <input type="text" value="ILR000106674"/>		Handler Name: <input type="text"/>			
Location Street Number: <input type="text"/>		Location Street Name: <input type="text"/>			
Location City: <input type="text"/>		Location State: <input type="text" value="Select"/>		Location Zip: <input type="text"/>	
Location County: <input type="text" value="No Counties to Select"/>		State District: <input type="text"/>			
<input type="checkbox"/> Check this box to search on active sites only.		<input type="checkbox"/> Click this box to also Search Other IDs.		<input type="checkbox"/> Click this box to do a historical name search.	

[Search](#) [Reset Form](#) [Back to Main Menu](#)

Page: 1

There are 1 records, displaying 1 - 1. Select the handler to process.

	Act Loc	▲ Handler ID ▼	▲ Handler Name ▼	▲ Address ▼	▲ City ▼	▲ State ▼	▲ County ▼	Active Status	In a Universe	Controls in Place
1	IL	ILR000106674	CCI MANUFACTURING IL CORP	15550 CANAL BANK RD	LEMONT	IL	COOK	H—	Y	N

Page: 1

URL: /rcrainfo/searches/search.jsp



Land and Chemicals Division

Type of Document:

- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Return to Compliance
- ☐ NOD Memo to ORC
- ☐ SNC Memo
- ☐ Other Correspondence

Facility Name: CCI Manufacturing IL Corporation

City: Lemont

State: Illinois

U.S. EPA ID#: ILR000106674

Assigned Staff: Todd Brown

Phone: (312) 886-6091

Name	Signature	Date
Author	<i>Todd Brown</i>	<i>4/9/12</i>
Regional Counsel	<i>C. H. Kuziocki</i>	<i>4/9/12</i>
Section Chief	<i>Robert L. Smith</i>	<i>4/10/12</i>
Branch Chief	<i>Jerry Victorine</i>	<i>4/18/12</i>

*RSC
4/14*

*BC
4/17*

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

Once the certified mail receipt is returned:

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 25 2012

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED 7001 0320 0005 8921 9908

Ms. Milena Strama
Quality Assurance Administrator
CCI Manufacturing IL Corporation
15550 Canal Bank Road
Post Office Box 339
Lemont, Illinois 60439

Re: Notice of Violation
CCI Manufacturing IL Corporation
EPA ID No.: ILR000106674

Dear Ms. Strama:

On February 28, 2012 a representative of the U.S. Environmental Protection Agency inspected the CCI Manufacturing IL Corporation (CCI) located in Lemont, Illinois. The purpose of the inspection was to evaluate CCI's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by CCI personnel, review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that CCI is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (C.F.R.). To be eligible for the exemption from having a hazardous waste storage permit, a small quantity generator of hazardous waste must be in compliance with the conditions of 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)]. We find that CCI was in noncompliance with the following conditions for a hazardous waste storage permit exemption.

1. A generator that generates greater than 100 kilograms but less than 1,000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that, among other things, the generator posts the following information next to the telephone: (i) the name and telephone number of the emergency coordinator; (ii) location of fire extinguishers and spill control material and, if present, fire alarm; and

(iii) the telephone number of the fire department, unless the facility has a direct alarm. See 35 IAC § 722.134(d)(5)(B) [40 C.F.R. § 262.34(d)(5)(ii)].

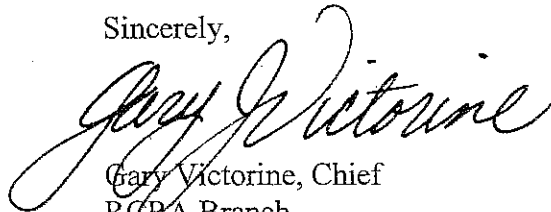
At the time of the inspection, the location of fire extinguishers and spill control equipment was not posted next to the telephone. Therefore, CCI failed to comply with the above mentioned condition for a hazardous waste storage permit exemption.

2. A small quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)] is an operator of a hazardous waste storage facility and is required to obtain an Illinois hazardous waste storage permit. See 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)]. Upon failing to meet the conditions identified in item number 1, above, CCI became an operator of a hazardous waste storage facility. CCI has not applied for or received a hazardous waste storage permit nor does CCI have interim status. CCI's failure to apply for and obtain an Illinois hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121 [40 C.F.R. § 270.1(c)] and Section 3005(a) of RCRA, 42 U.S.C. § 6925(a).

At this time, EPA is not requiring CCI to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Todd C. Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,



Gary Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel (todd.marvel@Illinois.gov), Illinois Environmental Protection Agency

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0025 Expires 10/31/02
GSA No. 1245-014-0001

Please refer to Section V, Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

RECEIVED	Date Received (For Official Use Only) MAY 01 2002
	PROGRAM MANAGEMENT BRANCH
	Division

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. Initial Notification ☒ B. Subsequent Notification (Complete item C)

C. Installation's EPA ID Number

I L R 0 0 0 1 0 6 6 7 4

II. Name of Installation (Include company and specific site name)

I N T A C A U T O M O T I V E P R O D U C T S I N C

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1 5 5 5 0 C A N A L B A N K R O A D

Street (Continued)

City or Town

L E M O N T

State

I L

Zip Code

6 0 4 3 9

RCRA RECORDS ROOM

Was 3 Pesticides & Toxics Division
U.S. EPA REGION 5

County Code

0 0 0

County Name

C O O K

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

S V O B O D A

(First)

R O N

Job Title

G R O U P M A N A G E R

Phone Number (Area Code and Number)

6 3 0 - 7 3 9 - 0 6 0 6

VI. Installation Contact Address (See instructions)

A. Contact Address

Location

☒

Mailing

☐

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

I N T A C A U T O M O T I V E P R O D U C T S I N C

Street, P.O. Box, or Route Number

1 5 5 5 0 C A N A L B A N K R O A D

City or Town

L E M O N T

State

I L

Zip Code

6 0 4 3 9

Phone Number (Area Code and Number)

6 3 0 - 7 3 9 - 0 6 0 6

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

☒

No

Date Changed

Month Day Year

ca 5/1/02

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☒ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Exempt Boiler and/or Industrial Furnace
- ☐ a. Smelting, Melting, and Refining Furnace Exemption
- ☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

- ☐ Large Quantity Handler of Universal Waste

RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division

IX. Description of Hazardous Wastes (Use additional sheets if necessary) REGION 5

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 5	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001) <input checked="" type="checkbox"/>	2. Corrosive (D002) <input checked="" type="checkbox"/>	3. Reactive (D003) <input type="checkbox"/>	4. Toxicity Characteristic <input type="checkbox"/>	1	2	3	4
--	--	--	--	---	---	---	---

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Yoshio Kinsho

Name and Official Title (Type or print)

Yoshio Kinsho, Executive Vice President

Date Signed

4/25/02

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

24 April 2002

U.S. EPA Region 5
RCRA Activities
77 West Jackson Boulevard
P.O. Box A3587
Chicago, Illinois 60690

RECEIVED
MAY 01 2002
PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

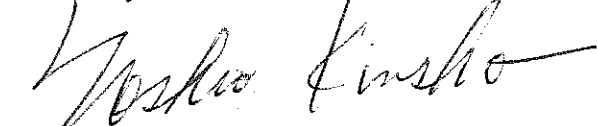
RE: Notification of Regulated Waste Activity

Dear Sir or Madam:

Enclosed is a Notification of Regulated Waste Activity for INTAC Automotive Products, Inc. (INTAC). Please note that INTAC is requesting a Conditionally Exempt Small Quantity Generator status.

If you have any questions, please call Ron Svoboda of INTAC at (630) 739-0606 extension 512.

Sincerely,



Yoshio Kinsho
Executive Vice-President
INTAC Automotive Products, Inc.

Enclosures

cc: Ron Svoboda, INTAC (w/enclosures)
Jill Meyer, ERM (w/enclosures)

RECEIVED
MAY 02 2002
RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Please print or type with BLATE type (12 characters per inch) in the unshaded areas only

CLARK CON-EPA-07

EPA		Notification of Regulated Waste Activity		Date Received (For Official Use Only) JUN 13 2001	
United States Environmental Protection Agency		WASTE MANAGEMENT BRANCH			
I. Installation's EPA ID Number (Mark "X" in the appropriate box)					
<input checked="" type="checkbox"/> A. First Notification		<input type="checkbox"/> B. Subsequent Notification (complete item C)		C. Installation's EPA ID Number	
				ILR000106674	
II. Name of Installation (Include company and specific site name)					
INTAC AUTOMOTIVE PRODUCTS INC					
III. Location of Installation (Physical address not P.O. Box or Route Number)					
Street					
15550 CANAL BANK ROAD DECEIVE					
Street (continued)					
City or Town					
LEMONI					
State					
IL					
ZIP Code					
60439					
County Code					
000					
County Name					
COOK					
IV. Installation Mailing Address (See instructions)					
Street or P.O. Box					
PO BOX 339					
City or Town					
LEMONI					
State					
IL					
ZIP Code					
60439					
V. Installation Contact (Person to be contacted regarding waste activities at site)					
Name (last)			(first)		
BIERMAN			EDWARD		
Job Title			Phone Number (area code and number)		
CROWD MANAGER			630-739-0606		
VI. Installation Contact Address (See instructions)					
A. Contact Address Location		B. Street or P.O. Box			
<input checked="" type="checkbox"/> A		<input type="checkbox"/> B			
		PO BOX 339			
City or Town		State		ZIP Code	
LEMONI		IL		60439	
VII. Ownership (See instructions)					
A. Name of Installation's Legal Owner					
INTAC AUTOMOTIVE PRODUCTS INC					
Street, P.O. Box, or Route Number					
PO BOX 339 15550 CANAL BANK RD					
City or Town					
LEMONI					
State					
IL					
ZIP Code					
60439					
Phone Number (area code and number)			B. Land Type		
630-739-0606			<input type="checkbox"/>		
			C. Owner Type		
			<input checked="" type="checkbox"/>		
			D. Change of Owner Indicator		
			Yes <input type="checkbox"/> No <input type="checkbox"/>		
			(Date Changed) Month Day Year		

JH
6/20/01

Use plain or type with elite type (12 characters per inch) in the unshaded areas only

USE PLAIN OR TYPE WITH ELITE TYPE (12 CHARACTERS PER INCH) IN THE UNSHADED AREAS ONLY
EPA FORM 8700-12 (Rev. 9-92)

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities
<input checked="" type="checkbox"/> 1. Generator (See instructions) <input type="checkbox"/> a. Greater than 1000 kg/mo (2,200 lbs.) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.) <input type="checkbox"/> 2. Transporter (Indicate Mode in boxes 1-3 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation: <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify _____ <input type="checkbox"/> 3. Treater, Storer, Disposer (at installation). Note: A permit is required for this activity. See instructions. <input type="checkbox"/> 4. Hazardous Waste Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Boiler and/or Industrial Furnaces <input type="checkbox"/> 1. Smelter Refractory <input type="checkbox"/> 2. Small Quantity Exemption Indicate Type of Combustion Device(s): <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 5. Underground Injection Control	<input type="checkbox"/> 1. Off-Specification Used Oil Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device: <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification	

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Flammable (D003)	4. Toxic Characteristic (D004)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. F003	6. F005	7. F006	8. F007	9. F008	10. F009	11. F010	12. F011
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C. Other Wastes. (State other wastes requiring a handler to have an I.D. number. See instructions.)

1	2	3	4	5	6
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

EPA Form 8700-12 (Rev. 9-92) Previous edition is obsolete.

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JUN 28 2001
WASTE, PESTICIDES & TOXICS DIVISION
U.S. EPA - REGION 5

HERITAGE ENVIRONMENTAL SERVICES, LLC

15330 CANAL BANK RD.

LEMONT, IL 60439

630/739-1151, ext. 228

FAX: 630/739-3294

Pages 3

TO: Chris Klemme 312 353 6519
FROM: Amadee Schinkowski

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JUN 28 2001


RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA REGION 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: CCI Manufacturing IL Corporation
U.S. EPA ID No.: ILR000106674
LOCATION ADDRESS: 15550 Canal Bank Road
Lemont, Illinois 60439
NAICS CODE: 325998 – All other Miscellaneous Chemical
Product and Preparation Manufacturing
DATE OF INSPECTION: February 28, 2012
U.S. EPA INSPECTOR: Todd C. Brown

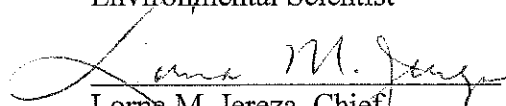
PREPARED BY:


Todd C. Brown
Environmental Scientist

Date

3/5/12

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch

Date

3/5/12

I. Purpose of Inspection

The purpose of this unannounced compliance evaluation inspection (CEI) was to evaluate the compliance of CCI Manufacturing IL Corporation (CCI) with the Resource Conservation and Recovery Act (RCRA), with respect to CCI's management of hazardous waste.

II. Plant Description/Back Ground

CCI operates an automotive fluids manufacturing facility in Lemont, IL. Its six acre facility is located along the Illinois and Michigan Canal, in Lemont, Illinois (Figure 1). Two out-door tank farms and a single story building are located on the premises. CCI primarily manufactures anti-freeze, break fluid, and windshield wiper fluid.



Figure 1. Aerial view of CCI Manufacturing IL Corporation, Lemont, Illinois. The red triangle marks the approximate boundaries of the facility. Source: ArcGIS Explorer®.

CCI has notified as a small quantity generator of hazardous waste (SQG). Hazardous wastes identified in notifications and reports include ignitable (D001), corrosive (D002), and toxicity characteristic wastes (for chloroform (D022) and pyridine (D038)), as well as F-listed halogenated (F001 and F002) and non-halogenated solvent waste (F003 and F005).

CCI is under the umbrella of a global corporation, CCI Corporation, head-quartered in Japan. CCI Corporation operates additional facilities in the United Kingdom, Mexico, Brazil, Thailand, Taiwan, China, Hong Kong, and Australia.

III. Opening Conference

I arrived at CCI on February 28, 2012, at approximately 9:39 A.M. After identifying myself at both a security check point and reception window, I was greeted by Ms. Milena Strama, Quality Assurance Administrator. I presented Ms. Strama with my EPA credentials, and explained the reason for my visit.

I conducted an opening conference with Ms. Strama and Mr. Dan Aloia, Vice President. At the onset, I provided Ms. Strama with a list of pollution prevention contacts in Region 5, the U.S. EPA Small Business Handout, and an Illinois Sustainable Technology Center (ISTC) pamphlet.

During the conference, I explained the purpose of the inspection, and interviewed Ms. Strama and Mr. Aloia on CCI's operations and waste management activities. The following is a summary of the information provided in response to my inquiries.

CCI blends formulations of brake fluid, anti-freeze, and windshield wiper fluid in kettles and tanks. The main components of brake fluid are glycol ethers. Anti-freeze primarily consists of ethylene glycol. Methanol is the primary component in windshield wiper fluid.

Hazardous wastes generated at the facility include methanol and potassium hydroxide from the flushing of loading equipment. Solvent wastes are generated by the Quality Assurance (QA) Lab. CCI stores its hazardous waste in containers. Ms. Strama estimated that CCI generates approximately one to two 55-gallon containers of hazardous waste per month.

During the conference, I inquired as to the origin of ethylene glycol and methanol shipments to Consolidated Recycling Company, Inc., Troy, Indiana (Consolidated Recycling), reported on CCI's Toxics Release Inventory (TRI) forms in 2003 and 2008. At the time, the CCI representatives could not answer as to the methanol.¹ They explained that the ethylene glycol shipments consisted of anti-freeze that was flushed from loading equipment, which is necessary to prevent contamination when the formulation being loaded is different from that which previously passed through the equipment. Off-specification antifreeze could also have been included on the reports. I was provided with a copy of a beneficial use determination (BUD) issued by the Illinois EPA, (Log No. BUD10-005), dated March 25, 2010. The BUD appears to approve the use of the anti-freeze flushes in the manufacture anti-freeze at offsite locations (namely, Recycling Fluid Technologies, Inc.), provided certain conditions and limits are adhered to.

There are approximately 35 employees at CCI. CCI leases the property.

1. After the inspection, CCI provided information to the inspector regarding the reported methanol shipments in an e-mail correspondence dated February 28, 2012. CCI stated that the methanol in 2008 was not sent to Consolidated Recycling, but rather to Heritage Environmental Services in Indianapolis, Indiana. CCI provided three contemporaneous certificates in support. CCI suggested that their consultant may have mistakenly named Consolidated Recycling as the receiving facility, since at the time, CCI sent its anti-freeze flush waste (i.e., ethylene glycol) to Heritage Environmental Services, who in turn sent the material to Consolidated Recycling.

IV. Tour of Facility Operations

At approximately 10:12 A.M., I accompanied Ms. Strama on a tour of the facility. The tour included both the indoor and outdoor portions of the property. Specific areas toured included, but were not limited to: shipping/receiving, raw materials storage, brake fluid blend room, anti-freeze blend room, anti-freeze load-out, and the two outdoor tank farms. During the tour, I noted the following.

- One 55-gallon container of corrosive waste generated from line flushing was located near a dock door where the waste is generated through loading activities (photographs 1 and 2).
- The anti-freeze load-out area is located outdoors. A curbed sump covered by metal grating is used to collect anti-freeze that is flushed from the lines between loads of differing formulations (photograph 3). It is the antifreeze that is currently being loaded that is used to flush the line. The antifreeze is then transferred to an adjacent storage tank, prior to off-site shipment (photograph 4).
- One 55-gallon container of methanol flush waste was located in the vicinity of the anti-freeze load-out area (photographs 5 and 6). The container was labeled as a hazardous waste. During the tour, Ms. Strama described the generation of the methanol flush waste. The windshield washer fluid blending process involves adding ingredients to a tanker car of methanol. The unloading lines of the tanker car are then flushed with the mixture, to ensure they are purged of residual materials.
- Several containers of hazardous waste were located in the QA Lab. The waste streams included methanol (photograph 7), acidic waste (photo 8), and wipes contaminated with solvent (photograph 9).

V. Records Review

I reviewed hazardous waste manifests dating back to 2010. The records indicated that one shipment of hazardous waste had occurred thus far in 2012; consisting of two 55-gallon containers of methanol/acetone waste to Heritage Environmental Services in Indianapolis, Indiana (Manifest Document Number 000434213 WAS).

The ethylene glycol (i.e., anti-freeze) managed under the BUD is shipped under a bill-of-lading to Recycling Fluid Technologies, Inc., 9207 Cotters Road, Richland, Michigan, 49083. There are multiple shipments per month, each consisting of approximately 46,000 lbs. Analytical results for pH and ethylene glycol concentration were attached to each shipment. I noted pH measurements between 5 and 8. Ethylene glycol content was variable.

Prior to May 2010 (and the issuance of the BUD), the ethylene glycol was shipped on a manifest to various locations; though no EPA hazardous waste numbers were identified. I asked Ms.

Strama why a hazardous waste manifest was used if the material had not been identified as a hazardous waste. Ms. Strama replied that it was at the request of the Illinois EPA.

No records of methanol shipments to Consolidated Recycling could be located at the time of the inspection (see footnote 1). At the time, Ms. Strama did not think such shipments had occurred, since to her knowledge, CCI had only used Consolidated Recycling for shipments of anti-freeze flushes in the past.

I asked Ms. Strama whether the name and number of the Emergency Coordinator (identified as Mr. Aloia), and the locations of fire extinguishers and spill control equipment were posted next to a telephone. In reply, it was explained that the EC's information is posted in the break room; though the locations of fire extinguishers and spill control equipment were not posted.

According to Ms. Strama, an independent Professional Engineer provides annual training to employees with hazardous waste duties. Department of Transportation Training is conducted every three years.

VI. Closing Conference

Prior to departing the facility, I informed Ms. Strama and Mr. Aloia of the requirement for SQGs to post the locations of fire extinguishers and spill control equipment next to the telephone. I also requested that they follow up with me on the reported methanol shipments to Consolidated Recycling, if and when they locate the appropriate records.

I left CCI at approximately 11:46 A.M.

Attachments:

- A: Inspection Photographs
- B: Small Quantity Generator Check List

Attachment A: Inspection Photographs - CCI Manufacturing IL Corporation (ILR000106674)

Photo Number 1
Photo Filename DSCN0178.jpg
Date/Time 2/28/2012
10:24:46 AM
Photographer Todd C. Brown

Description

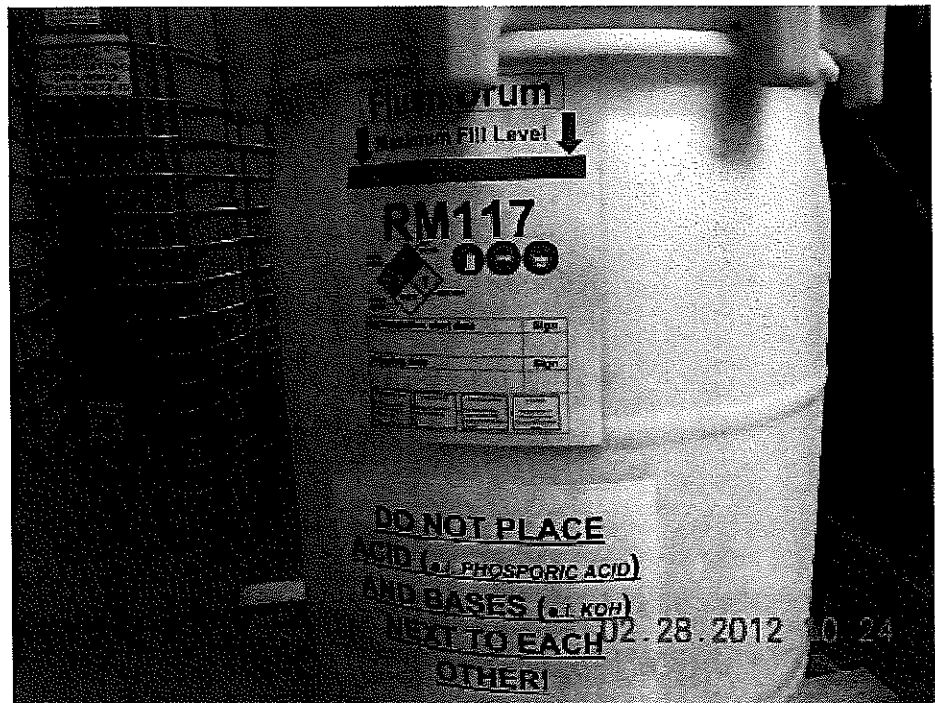
Container of corrosive waste generated from flushing operations. Different products may be loaded using the same lines. Prior to loading a product, lines are flushed into containers using the current load, to prevent contamination by a previous load.



Photo Number 2
Photo Filename DSCN0179.jpg
Date/Time 2/28/2012
10:24:56 AM
Photographer Todd C. Brown

Description

Labeling on container featured in photograph #1.



Attachment A: Inspection Photographs - CCI Manufacturing IL Corporation (ILR000106674)

Photo Number 3

Photo Filename DSCN0180.jpg

Date/Time 2/28/2012
10:44:06 AM

Photographer Todd C. Brown

Description

Anti-freeze load-out area. Different formulations of anti-freeze product are loaded through this equipment. Prior to loading, the hosing/piping is first flushed into the sump with the current product to prevent contamination from the previous product.

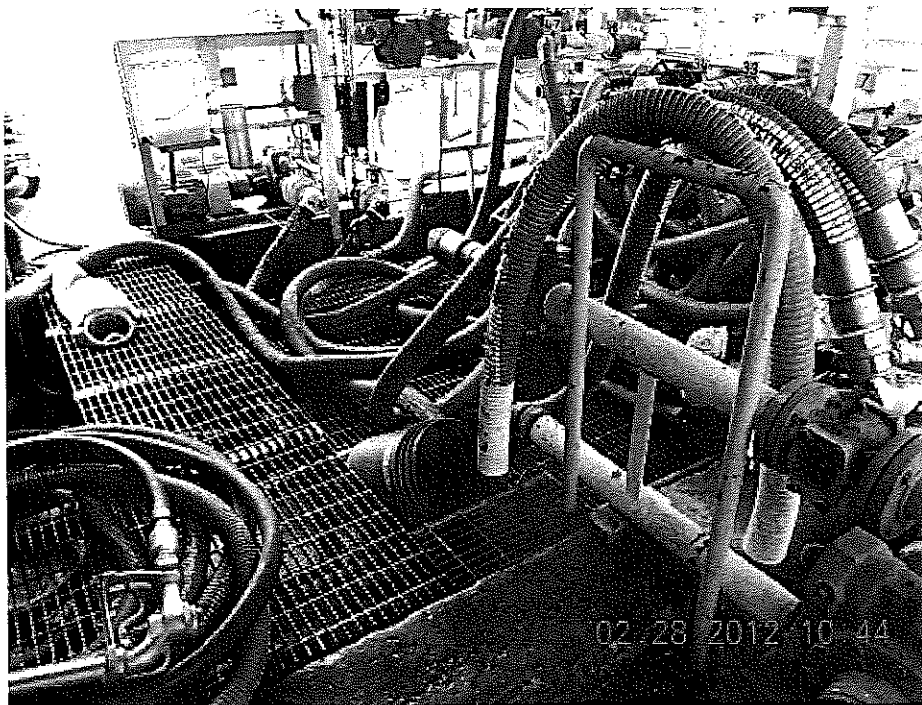


Photo Number 4

Photo Filename DSCN0181.jpg

Date/Time 2/28/2012
10:44:26 AM

Photographer Todd C. Brown

Description

Storage tank (#24) used to store the anti-freeze flushings that accumulate in the sump featured in photograph #3.



Attachment A: Inspection Photographs - CCI Manufacturing IL Corporation (ILR000106674)

Photo Number 5

Photo Filename DSCN0182.jpg

Date/Time 2/28/2012
10:46:04 AM

Photographer Todd C. Brown

Description

Drum of methanol flush-waste located in close proximity to the anti-freeze load-out area.



Photo Number 6

Photo Filename DSCN0183.jpg

Date/Time 2/28/2012
10:46:12 AM

Photographer Todd C. Brown

Description

Label on the methanol flush-waste container featured in photograph #5.



Attachment A: Inspection Photographs - CCI Manufacturing IL Corporation (ILR000106674)

Photo Number 7

Photo Filename DSCN0184.jpg

Date/Time 2/28/2012
11:01:20 AM

Photographer Todd C. Brown

Description

15-gallon container of methanol waste located in the Quality Assurance Laboratory.

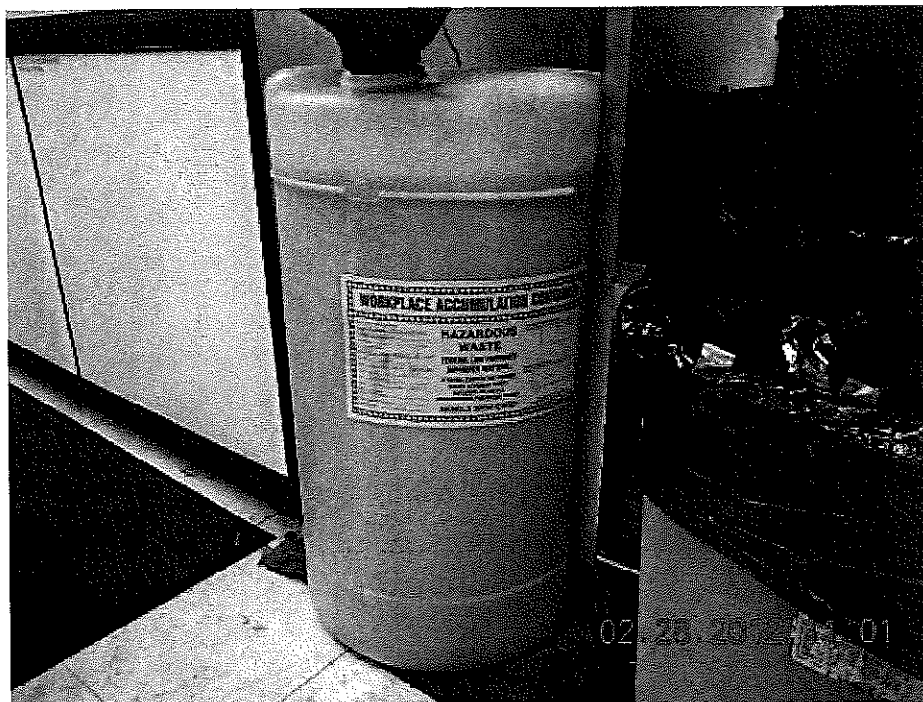


Photo Number 8

Photo Filename DSCN0185.jpg

Date/Time 2/28/2012
11:02:12 AM

Photographer Todd C. Brown

Description

Storage cabinet under a hood in the Quality Assurance Laboratory. The back row contained two containers of corrosive (acidic) hazardous waste.



Attachment A: Inspection Photographs - CCI Manufacturing IL Corporation (ILR000106674)

Photo Number 9

Photo Filename DSCN0186.jpg

Date/Time 2/28/2012
11:02:48 AM

Photographer Todd C. Brown

Description

Container for the accumulation of wipes contaminated with solvent located in the Quality Assurance Laboratory.



Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO SMALL-QUANTITY GENERATORS OF HAZARDOUS WASTE (100 - 1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Section 722.112 USEPA Identification Numbers	808.121(a)
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
	If "No", proceed to Section 722.120(e).	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(d)
722.120(e)	Does the generator reclaim waste through a contractual agreement with a recycling facility in which: - the type of waste and frequency of shipments are specified in the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - the generator has maintained a copy of the agreement for 3 years after termination or expiration of the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(e)
728.107(a)(10)	Has a small-quantity generator with a tolling (contractual) agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.107(a)(10)
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: <ul style="list-style-type: none"> signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	722.123(a)
722.123(b)	<ul style="list-style-type: none"> has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	722.123(b)
722.123(c)	<ul style="list-style-type: none"> has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 	722.123(c)
	SUBPART C: PRE-TRANSPORT REQUIREMENTS Is there any hazardous waste ready for transport off-site? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(c))	Section 722.134 Accumulation Time Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words to identify the contents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(d))	Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Note: If the quantity of hazardous waste on-site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703. Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", go to Subpart J.	Emergency Info Postings
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(722.134(a)(2))	Is the accumulation start date marked on each container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	only satellite
(722.134(a)(3))	Is each container marked with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	on site
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Note: If "No", go to Subpart C. COMMENTS:	
	SUBPART J: TANK SYSTEMS Section 725.301 Generators of 100 to 1000 kg/mo.	
(722.134(a)(2))	Is each tank marked with the words "Hazardous Waste"? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.301(b)(1))	Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.301(b)(2))	Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.301(b)(3))	Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.301(b)(4))	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by-pass system to a stand-by tank)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <u> </u> No <u> </u> N/A <u> </u> - agreements designating the primary authority where more than one police or fire department might respond? Yes <u> </u> No <u> </u> N/A <u> </u> - agreements with State emergency response teams, contractors and equipment suppliers? Heritage Per emergency response No <u> </u> N/A <u> </u> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <u> </u> No <u> </u> N/A <u> </u> 	
(728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Is the plan on-site? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Does the plan include a detailed physical and chemical analysis? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <u> </u> No <u> </u> N/A <u> </u></p>	
(722.134(d)(5))	<p>A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures? <u>DAW</u> Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>B) Is the following information posted next to the telephone:</p> <ul style="list-style-type: none"> - the name and telephone number of the emergency coordinator? Yes <u> </u> No <u> </u> N/A <u> </u> - the location of fire extinguishers and spill control equipment and, if present, fire alarms? Yes <u> </u> No <u> </u> N/A <u> </u> - the number of the fire department unless the facility has a direct alarm? <u>Direct Alarm</u> Yes <u> </u> No <u> </u> N/A <u> </u> <p>C) Have employees received the proper waste handling and emergency procedures training relevant to their positions? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Note: A small-quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on-site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).</p> <p>SUBPART D: RECORDKEEPING AND REPORTING</p>	
722.140(a)	<p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - a copy of each signed manifest? Yes <u> </u> No <u> </u> N/A <u> </u> 	722.140(a)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <u> </u> No <u> </u> N/A <u> </u> 	722.140(c)

JB

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A _____	722.140(d)
722.142(b)	Section 722.142 Exception Reporting Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? Yes _____ No _____ N/A _____	722.142(b)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A _____	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes _____ No <u> / </u> N/A <u> / </u> If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No <u> / </u> N/A <u> / </u>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes _____ No <u> / </u> N/A <u> / </u> If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No <u> / </u> N/A <u> / </u>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes _____ No <u> / </u> N/A <u> / </u> If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No <u> / </u> N/A <u> / </u>	722.170
	COMMENTS:	



2008 Methanol follow up

Milena Strama

to:

Todd Brown

02/28/2012 04:37 PM

Cc:

Dan Aloia

Hide Details

From: Milena Strama <milena.strama@cci-corporation.com>

To: Todd Brown/R5/USEPA/US@EPA

Cc: Dan Aloia <dan.aloia@cci-corporation.com>

History: This message has been replied to.

1 Attachment



Methanol Form R 2008.pdf

Dear Todd,

In follow up to your question regarding 2008 Waste Methanol amount of 3307 lbs. I looked back and we did report that number as waste methanol flush for the 2008 reporting year (three separate shipments). Please see the documentation I have attached showing the disposal certificates from Heritage Environmental. The error occurred when it was reported that Heritage sent this waste to Consolidated Recycler's in Troy IN it actually went to Heritage Environmental in Indianapolis, IN.

I suppose our consultant listed Consolidated Recycling because back in 2008 we sent our flush antifreeze to Heritage who sent it to Consolidated Recyclers to recycle the EG.

This was a service we paid for in 2008. We now sell this antifreeze flush under our BUD permit with IEPA.

I hope this answers your questions if you have any more please let me know.

Thank-you...

Best Regards,

Milena Strama

QA Administrator

CCI Manufacturing IL Corp.

Certified - ISO/TS16949 & ISO14001 & OHSAS18001

Phone: 630-685-7534

Fax: 630-685-7584

Confidentiality Notice: This e-mail message (including any attachments) is covered by the Electronic Communication Privacy Act, 18 U.S.C. 2510-2521, is for the sole use of intended recipient(s) and may contain confidential and legally privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail, delete and destroy all copies of the original message.



Generator Mailing Address :

Facility : HERITAGE ENVIRONMENTAL SERVICES LLC
7901 WEST MORRIS STREET
INDIANAPOLIS, IN 46231

(317)243-0811

IND093219012

Stop : 967918

CCI MANUFACTURING IL CORPORATION
P.O. BOX 339
15550 CANAL BANK ROAD
LEMONT, IL 60439

Certificate of Proper Management

HERITAGE ENVIRONMENTAL SERVICES, LLC CERTIFIES AND ASSURES TO OUR CUSTOMERS THAT THE TRANSACTION DESCRIBED, INCLUDING TREATMENT AND/OR STORAGE AND/OR RECLAMATION AND/OR RECYCLING AND/OR DISPOSAL SHALL BE HANDLED IN COMPLIANCE WITH ALL APPLICABLE LOCAL, STATE, AND FEDERAL LAWS AND REGULATIONS.

Generator Site Address : Gen# : 13867

DOCUMENT : 000133454WAS

CCI MANUFACTURING IL CORPORATION
P.O. BOX 339
15550 CANAL BANK ROAD
LEMONT, IL 60439

EPA ID NUMBER : ILR000106674

DATE RECEIVED : 08-FEB-08

Wastestream	# Containers	Total Pounds
10 SOLVENTS	4	1,693
Totals	4	1,693



Generator Mailing Address :

Facility : HERITAGE ENVIRONMENTAL SERVICES LLC
7901 WEST MORRIS STREET
INDIANAPOLIS, IN 46231

(317)243-0811

IND093219012

Stop : 987022

CCI MANUFACTURING IL CORPORATION
P.O. BOX 339
15550 CANAL BANK ROAD
LEMONT, IL 60439

Certificate of Proper Management

HERITAGE ENVIRONMENTAL SERVICES, LLC CERTIFIES AND ASSURES TO OUR CUSTOMERS THAT THE TRANSACTION DESCRIBED, INCLUDING TREATMENT AND/OR STORAGE AND/OR RECLAMATION AND/OR RECYCLING AND/OR DISPOSAL SHALL BE HANDLED IN COMPLIANCE WITH ALL APPLICABLE LOCAL, STATE, AND FEDERAL LAWS AND REGULATIONS.

Generator Site Address : Gen# : 13867

DOCUMENT : 000166113WAS

CCI MANUFACTURING IL CORPORATION
P.O. BOX 339
15550 CANAL BANK ROAD
LEMONT, IL 60439

EPA ID NUMBER : ILR000106674

DATE RECEIVED : 13-MAY-08

Wastestream	# Containers	Total Pounds
10 SOLVENTS	2	818
Totals	2	818



Generator Mailing Address :

Facility : HERITAGE ENVIRONMENTAL SERVICES LLC
7901 WEST MORRIS STREET
INDIANAPOLIS, IN 46231

(317)243-0811

IND093219012

Stop : 1027150

CCI MANUFACTURING IL CORPORATION
P.O. BOX 339
15550 CANAL BANK ROAD
LEMONT, IL 60439

Certificate of Proper Management

HERITAGE ENVIRONMENTAL SERVICES, LLC CERTIFIES AND ASSURES TO OUR CUSTOMERS THAT THE TRANSACTION DESCRIBED, INCLUDING TREATMENT AND/OR STORAGE AND/OR RECLAMATION AND/OR RECYCLING AND/OR DISPOSAL SHALL BE HANDLED IN COMPLIANCE WITH ALL APPLICABLE LOCAL, STATE, AND FEDERAL LAWS AND REGULATIONS.

Generator Site Address : Gen# : 13867

DOCUMENT : 000180986WAS

CCI MANUFACTURING IL CORPORATION
P.O. BOX 339
15550 CANAL BANK ROAD
LEMONT, IL 60439

EPA ID NUMBER : ILR000106674

DATE RECEIVED : 28-SEP-08

Wastestream	# Containers	Total Pounds
10 SOLVENTS	2	863
Totals	2	863

2008 TRI REPORTING
CCI MANUFACTURING IL CORPORATION
LEMONT, ILLINOIS

Methanol

Date	Amount (lbs.)	Where
Jan-08	1693	HES
Apr-08	818	HES
1-Sep	863	HES
Total	3374	

3307 HES

HES = HERITAGE ENVIRONMENTAL SERVICES

Data from 2008 CCI Waste Summary Report and M. Strama (98% methanol in waste)

Form Status: Available for Editing
Validation Status: Passed w/ Data Quality Alerts

Form Approved OMB Number: 2070-0093

(IMPORTANT: Type or print; read instructions before completing form)

Approval Expires: 03/31/2011

Page 1 of 5

EPA United States Environmental Protection Agency		FORM R Section 313 of the Emergency Planning and Community Right-to-know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act.		TRI Facility ID Number 60439NTCTM15550	
				Toxic Chemical, Category or Generic Name Methanol	
WHERE TO SEND COMPLETED FORMS:		1. TRI Data Processing Center P.O.Box 1513 Lanham, MD 20703-1513 *** Draft Form Only: Do Not Submit to EPA ***		2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)	
This section only applies if you are revising or withdrawing a previously submitted form, otherwise leave blank:		Revision (enter up to two code(s)) [] []		Withdrawal (enter up to two code(s)) [] []	
Important: See Instructions to determine when "Not Applicable (NA)" boxes should be checked.					
Part I. FACILITY IDENTIFICATION INFORMATION					
SECTION 1. REPORTING YEAR: 2008					
SECTION 2. TRADE SECRET INFORMATION					
2.1 Are you claiming the toxic chemical identified on page 2 trade secret? <input type="checkbox"/> Yes (Answer question 2.2; Attach substantiation forms) <input checked="" type="checkbox"/> NO (Do not answer 2.2; Go to Section 3)		2.2 Is this copy <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized (Answer only if "YES" in 2.1)			
SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.)					
I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.					
Name and official title of owner/operator or senior management official:		Signature:		Date Signed:	
Draft Form : Do Not Send to EPA					
SECTION 4. FACILITY IDENTIFICATION					
4.1		TRI Facility ID Number		60439NTCTM15550	
Facility or Establishment Name CCI MANUFACTURING IL CORP		Facility or Establishment Name or Mailing Address (if different from street address) CCI MANUFACTURING IL CORP			
Street 15550 CANAL BANK RD		Mailing Address PO BOX 339			
City/County/State/Zip Code LEMONT / Cook / IL / 60439		City/State/Zip Code LEMONT / IL / 60439		Country (Non-US)	
4.2 This report contains information for : (Important: check a or b; check c or d if applicable)		a. <input checked="" type="checkbox"/> An Entire facility		b. <input type="checkbox"/> Part of a facility	
		c. <input type="checkbox"/> A Federal facility		d. <input type="checkbox"/> GOCO	
4.3 Technical Contact name		MILENA STRAMA		Email Address MSTRAMA@CCI-IL.COM	
				Telephone Number (include area code) 6306857534	
4.4 Public Contact name		MILENA STRAMA		Email Address MSTRAMA@CCI-IL.COM	
				Telephone Number (include area code) 6306857534	
4.5 NAICS Code (s) (6 digits)		a. 325998 (Primary)		b. c. d. e. f.	
4.7 Dun and Bradstreet Number(s) (9 digits)					
a. 103312278					
b.					
SECTION 5. PARENT COMPANY INFORMATION					
5.1 Name of Parent Company		NA <input type="checkbox"/>		CCI CORP	

5.2 Parent Company's Dun & Bradstreet Number NA [X]

EPA Form 9350-1 (Rev. 03/2009) - Previous editions are obsolete.

Printed using TRIMEweb

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION		TRI Facility ID Number 60439NTCTM15550	
		Toxic Chemical, Category or Generic Name Methanol	
SECTION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you completed Section 2 below.)			
1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list. Enter category code if reporting a chemical category.) 67561		
1.2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.) Methanol		
1.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes". Generic Name must be structurally descriptive.) NA		
SECTION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you completed Section 1 above.)			
2.1	Generic Chemical Name Provided by Supplier (Important: Maximum of 70 characters, including numbers, spaces, and punctuation.) NA		
SECTION 3. ACTIVITIES AND USES OF THE TOXIC CHEMICAL AT THE FACILITY (Important: Check all that apply.)			
3.1	Manufacture the toxic chemical: a. <input type="checkbox"/> Produce b. <input type="checkbox"/> Import	3.2	Process the toxic chemical: a. <input type="checkbox"/> As a reactant b. <input checked="" type="checkbox"/> As a formulation component c. <input type="checkbox"/> As an article component d. <input type="checkbox"/> Repackaging e. <input type="checkbox"/> As an impurity
3.3	Otherwise use the toxic chemical: a. <input type="checkbox"/> As a chemical processing aid b. <input type="checkbox"/> As a manufacturing aid c. <input type="checkbox"/> Ancillary or other use		
SECTION 4. MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ONSITE AT ANY TIME DURING THE CALENDAR YEAR			
4.1	[06] (Enter two-digit code from instruction package.)		
SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE			
		A. Total Release (pounds/year*) (Enter range code or estimate**)	B. Basis of Estimate (enter code)
5.1	Fugitive or non-point air emissions NA []	0	O
5.2	Stack or point air emissions NA []	1112	O
5.3	Discharges to receiving streams or water bodies (enter one name per box)		
	Stream or Water Body Name		
5.3.1	NA		

*For Dioxin and Dioxin-like Compounds, report in grams/year
 **Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA Form 9350-1 (Rev. 03/2009) - Previous editions are obsolete.

Page 3 of 5

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)		TRI Facility ID Number		
		60439NTCTM15550		
		Toxic Chemical, Category or Generic Name		
		Methanol		
SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE (Continued)				
		NA	A. Total Release (pounds/year*) (enter range code** or estimate)	B. Basis of Estimate (enter code)
5.4.1	Underground Injection onsite to Class I wells	[X]		
5.4.2	Underground Injection onsite to Class II-V wells	[X]		
5.5	Disposal to land onsite			
5.5.1.A	RCRA subtitle C landfills	[X]		
5.5.1.B	Other landfills	[X]		
5.5.2	Land treatment/application farming	[X]		
5.5.3A	RCRA Subtitle C surface impoundments	[X]		
5.5.3B	Other surface impoundments	[X]		
5.5.4	Other disposal	[]	0	0
SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS				
6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTWs)				
6.1.A Total Quantity Transferred to POTWs and Basis of Estimate				
6.1.A.1 Total Transfers (pounds/year*) (enter range code** or estimate)		6.1.A.2 Basis of Estimate (enter code)		
NA				

EPA Form 9350-1 (Rev. 03/2009) - Previous editions are obsolete.

*For Dioxin and Dioxin-like Compounds, report in grams/year
 **Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

Page 4 of 5

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)						TRI Facility ID Number	
						60439NTCTM15550	
						Toxic Chemical, Category or Generic Name	
						Methanol	
SECTION 6.2 TRANSFERS TO OTHER OFF-SITE LOCATIONS							
6.2.1 Off-Site EPA Identification Number (RCRA ID No.)						IND098958283	
Off-Site Location Name						CONSOLIDATED RECYCLING COMPANY INC.	
Off-Site Address						8 COMMERCE DRIVE	
City	TROY	State	IN	County	Perry	Zip	47588
						Country (Non-US)	
Is location under control of reporting facility or parent company?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
A. Total Transfers (pounds/year*) (enter range code** or estimate)			B. Basis of Estimate (enter code)		C. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)		
1. 3307			1. O		1. M56.		
SECTION 7A. ONSITE WASTE TREATMENT METHODS AND EFFICIENCY							
<input checked="" type="checkbox"/> Not Applicable (NA) - Check here if no on-site waste treatment is applied to any waste stream containing the toxic chemical or chemical category.							
a. General Waste Stream (enter code)		b. Waste Treatment Method(s) Sequence (enter 3-character code(s))			d. Waste Treatment Efficiency Estimate		

EPA Form 9350-1 (Rev. 03/2009) - Previous editions are obsolete.

*For Dioxin and Dioxin-like Compounds, report in grams/year
 **Range Codes: A=1-10 pounds; B=11-499 pounds; C=500-999 pounds.

EPA FORM R PART II. CHEMICAL - SPECIFIC INFORMATION (CONTINUED)		TRI Facility ID Number			
		60439NTCTM15550			
		Toxic Chemical, Category or Generic Name			
		Methanol			
SECTION 7B. ON-SITE ENERGY RECOVERY PROCESSES <input checked="" type="checkbox"/> Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category. Energy Recovery Methods [enter 3-character code(s)]					
SECTION 7C. ON-SITE RECYCLING PROCESSES <input checked="" type="checkbox"/> Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category. Recycling Methods [enter 3-character code(s)]					
SECTION 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES					
		Column A Prior Year (pounds/year*)	Column B Current Reporting Year (pounds/year*)	Column C Following Year (pounds/year*)	Column D Second Following Year (pounds/year*)
8.1					
8.1a	Total on-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1b	Total other on-site disposal or other releases	251	1112	667	667
8.1c	Total off-site disposal to Class I Underground Injection Wells, RCRA Subtitle C landfills, and other landfills	NA	NA	NA	NA
8.1d	Total other off-site disposal or other releases	NA	NA	NA	NA
8.2	Quantity used for energy recovery onsite	NA	NA	NA	NA
8.3	Quantity used for energy recovery offsite	6920	3307	1984	1984
8.4	Quantity recycled onsite	NA	NA	NA	NA
8.5	Quantity recycled offsite	NA	NA	NA	NA
8.6	Quantity treated onsite	NA	NA	NA	NA
8.7	Quantity treated offsite	NA	NA	NA	NA
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)	NA			
8.9	Production ratio or activity index	0.6			
8.10	Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" in Section 8.10.1 and answer Section 8.11.				
	Source Reduction Activities [enter code(s)]	Methods to Identify Activity (enter codes)			
8.10.1	NA				
8.11	If you wish to submit additional optional information on source reduction, recycling, or pollution control activities, check "Yes."			Yes <input type="checkbox"/>	

TRI Facility ID Number
60439NTCTM15550
Toxic Chemical, Category or Generic Name
Methanol
Additional optional information on source reduction, recycling, or pollution control activities.

This book is the property
of the U.S. Government.

If found, please mail to:

U.S. EPA - Region 5

77 W. Jackson Blvd.

Mail Code LR-85

Chicago, IL 60604

or call, Todd Brown, U.S. EPA,

at (312) 896-6091.

RCA Inspection Notes.

CCI Manufacturing

IL Corporation.

15550 Canal Bank RD.

Lemont, IL 60439

EPA ID: ILR000106674

Date of Inspection, 2/28/12

Inspector: Todd Brown,

U.S. EPA Region 5, and

Chemicals Division, RCA

Branch, Compliance Section 1.

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of the U.S. Government.

It found, please mail to:

U.S. EPA - Region 5

77 W. Jackson Blvd.

Mail Code LR-85

Chicago, IL 60604

Call: Todd Brown, U.S. EPA,

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RCLR A Inspection Notes.

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15550 Canal Bank RD.

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EPA ID: ILR000106674

Date of Inspection, 2/28/12

Inspector: Todd Brown,

U.S. EPA Region 5, and a

Chemicals Division, RCLR A

Branch, Compliance Section 1.

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Dan Aloia
Vice President

**CCI MANUFACTURING IL
CORPORATION**

15550 Canal Bank Rd. PO Box#339
Lemont, IL 60439
TEL (630) 685-7538 CELL (630) 290-2799
FAX (630) 685-7588
E-mail: dan.aloia@cci-corporation.com
WEB: www.cci-il.com

RCRA Inspector's
Notes for inspection
at CCI Manufacturing
IL Corporation.

Unless otherwise noted,
all notes contained
in this book were
made by Todd Brown,
U.S. EPA, Region 5.

Todd Brown
2/29/12

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Dan Aloia
Vice President

**CCI MANUFACTURING IL
CORPORATION**

13550 Canal Bank Rd. PO Box#339
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in this book were
made by Todd Brown,
U.S. EPA, Region 5.

Todd Brown
2/29/12

ARRIVAL: 2/28/12 9:39 A.M.

Opening Conference.

Milena Strama - QA Administrator

Dan Aloia V.P.

Angela Elzy

1) Antifreeze Flush to recycler
stored in tank
picked up
& made back to Antifreeze

2) Off-Spec Antifreeze

Flushing of lines while
changes formula.

Antifreeze is 90%
ethylene Glycol
10% water

JB

Test Per PH & consistency
Beneficial Rees use determination
Permit from IEPA

Break fluid - glycol ^{main} esters
Antifreeze - ethylene glycol
washed with fluid
- methanol

Blending in tanks ketones
etc

Methanol Flush - Flush
- line after local truck
to contained.

- lab solvents

- Flushes from 1000 in
tank trucks - flush line

JB

ARRIVAL: 2/28/12 9:39 AM

Opening Conference.

Milena Strama - QA Administrator

Dan Aloia V.P.

Angela Elzeel

1) Antifreeze Flush to recycler
stored in tank
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Flushing of lines while
changes formula.

Antifreeze is 90%
ethylene Glycol
10% water

JB

Test Per PH & consistency
Beneficial Uses USE determination
Permit from IEPA

Break fluid - glycol ^{main} esters
Antifreeze - ethylene glycol
undeght wash fluid
- methanol
blending in tanks kettles
etc.

methanol flush - flush
- line after each truck
to contained.

- lab solvents

- flushes from 100 ft in
tank trucks - flush line

JB

As used 811.

~ 1-2 55 gal per month

~ Drum storage - 100 tanks
per 142 waste

off on a Box

Not sure about the method
they have permit for
regr of cathode glycol.

~ 35 employees

Lease property

CCF Manufact is Parent
Global

walk thru at ~ 10:12 AM

JB

Raw Material storage
/ Shipping & Receiving
drums & bags of
chemicals.

One drum of phosphoric
acid waste.

near dock floor
where line flush directly
waste is.

photo 1 + 2 labeled

break fluid blend

lemon.

Asst. freeze block
lemon

IEPA spread up.

JB

also used 811.

~ 1-2 55 gal per month

~ Drum strings - not tanks
per HAZ waste

off on a Box

Not sure about the methanol
they have permit for
regr of ethylene glycol.

~ 35 employees

Leave Property

CCF Manufact is Parent
Global

walk thro at ~ 10:12 AM

JB

Raw Material storage
/ Shipping & Receiving
drums & bags of
chemicals

1) One drum of phosphoric
acid waste.

near dock for
where line flush generally
waste is.

photo 1 + 2 labeled

break fluid blend

leson.

Asst. freeze block
room

IEPA spread up.

JB

Bottle from first station to Alice to situate her

went outside to see antifreeze label and recovery tank



↑ antifreeze

photo 3 + 4

one drum of methanol plus 9 as well labeled waz waste.

photos 5 + 6.

Flush lines of truck in which methanol was mixed with other ingredients after mixing & test to see ok.

RR

10:53 A.M. - Recindrew
MARPLOT Review.

went to lab.

small container missed of methanol waste labeled & boxed

photo 7.

2 containers seen
Acetal waste
labeled with 105. under
hood casing.

photo 8

photo 9 ~~the~~ / rag waste
solvent

RR

Boyle from first station to
allow him to situate
her

went outside to
see antifreeze label
next to recycle tank.



antifreeze

photo 3 + 4

one drum of material
flush as well
labeled hazardous

photos 5 + 6

Flush lines of truck
in which material was mixed
with other ingredients
after mixing test
to see ok

BR

10:53 A.M. - Recindrew
Manifest Review.

went to lab -

small container missed
of material waste
labeled & boxed

photo 7.

2 containers for
Acid waste
labeled with 105 under
Hazardous

photo 8

photo - 9 ~~Acid~~ / ray waste
solvent

BR

Manifest Review
2012 are Shipmat

2 SS gel Dams of
methane / as stone waste

to Heritage in Ind
006434213445

Manifests back to 2010

Shipping records per

Glycol - recycle.

Recovery Fluid Technologies,
Fine, Post Cutters
Road, Richland, MT 59083

~46,000 lbs per
Shipmat

each analyzed per
PH + Glycol only

HR

PH between 5-8

Glycol varied.

multiple Shipmats
per month.

Prior to Mar 2010
used to be Shipmat
on a manifest
to other locations

though description
as 0 was HAZARDOUS.

P.E. goes in once
a year to do training
DOT every 3 yrs.

No record of
Shipmat of methane
waste to Targor
Consolidated Recovery

only used thru for
Analysis Plus in
the post.

4/3

Manifest Review

2012 are shipman

2 SS gel Drums of
methane / acetone waste

to Heritage in Indy
006434213445

Manifests back to 2010

Shipping records per

glycol - recycle.

Receivng Fluid Technologies,
Finc, 900 + 607 407 4073
Road, Richland, NY 14083

~ 46,000 lbs per
shipment

each analyzed for
P4 + glycol only

HR

PA return 5-8

glycol varried.

multiple shipments
per month.

Prior to May 2010
used to be shipped
on a manifest
to other locations
though descriptions
as 100% HAZARDOUS.

P.E. Goes in once
a year to do training
DOT every 3 yrs.

no record of
shipment of methane
waste to Terry +
consolidated recycling

only used from for
ASTM or P4 in
the post.

413